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DEBTOR AND DEBTOR IN POSSESSION

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SPECIAL COUNSEL FOR ANSON FINANCIAL INC.  
DEBTOR AND DEBTOR IN POSSESSION

**UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF TEXAS  
FORT WORTH DIVISION**

**IN RE:** §  
§  
**ANSON FINANCIAL, INC.,** §      **CASE NO. 21-41517-elm-11**  
§  
**DEBTOR.**      §      **HEARING SET:**  
§      **May 23, 2022 at 9:30 a.m.**

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**FIRST INTERIM FEE APPLICATION OF SULLIVAN & COOK, LLC AS  
SPECIAL COUNSEL TO DEBTOR**

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**NO HEARING WILL BE CONDUCTED HEREON UNLESS A WRITTEN RESPONSE IS FILED WITH THE CLERK OF THE UNITED STATES BANKRUPTCY COURT AT THE ELDON B. MAHON U.S. COURTHOUSE, 501 W. 10TH ST., FORT WORTH, TX 76102-3643. BEFORE CLOSE OF BUSINESS ON APRIL 28, 2022, WHICH IS AT LEAST 21 DAYS FROM THE DATE OF SERVICE HEREOF.**

**ANY RESPONSE SHALL BE IN WRITING AND FILED WITH THE CLERK, AND A COPY SHALL BE SERVED UPON COUNSEL FOR THE MOVING PARTY PRIOR TO THE DATE AND TIME SET FORTH HEREIN. IF A RESPONSE IS FILED A HEARING MAY BE HELD WITH NOTICE ONLY TO THE OBJECTING PARTY.**

**IF NO HEARING ON SUCH NOTICE OR MOTION IS TIMELY REQUESTED, THE RELIEF REQUESTED SHALL BE DEEMED TO BE UNOPPOSED, AND THE COURT MAY ENTER AN ORDER GRANTING THE RELIEF SOUGHT OR THE NOTICED ACTION MAY BE TAKEN.**

**TO THE HONORABLE EDWARD L. MORRIS, U.S. BANKRUPTCY JUDGE:**

Sullivan & Cook, LLC (“Sullivan & Cook”), files this *First Interim Fee Application of Sullivan & Cook, LLC as Special Counsel to the Debtor* (the “Application”), relating to the role of Sullivan & Cook as special counsel to Anson Financial, Inc. (“Anson” or “Debtor”), in the Adversary Proceeding No. 21-04071, and in support thereof would show to the Court the following.

**INTRODUCTION**

1. Sullivan & Cook seeks interim approval of its fees and expenses for the period of February 9, 2022 through March 31, 2022 (the “Application Period”) and an order directing the Debtor to pay the amounts awarded herein.

**JURISDICTION AND VENUE**

2. This Court has jurisdiction to consider this Application under the provisions of 28 U.S.C. §§ 1334 and 157.

3. This matter involves the administration of a bankruptcy estate and, thus, is a core proceeding pursuant to 28 U.S.C. § 157(b)(2)(A).

4. Venue of this proceeding is proper in this district pursuant to 28 U.S.C. §§ 1408 and 1409.

5. This Court has constitutional authority to decide this matter under *Stern v. Marshall*, 564 U.S. 462 (2011) and its progeny.

**FACTUAL BACKGROUND**

**The identity and background of the Debtor**

6. Anson is a Texas corporation that has been in business for thirty-four (34) years in the real estate lending field. Anson originates or purchases debt instruments secured by real

property (e.g., promissory notes and deeds of trust) (collectively, the “Investor Notes”) and then assigns interests in the Investor Notes to investors.

### **The Commencement of the Bankruptcy Cases**

7. On June 25, 2021 (the “Petition Date”), Anson commenced the above-caption case by filing a voluntary petition under Chapter 11 of the Code. Anson is in possession of its assets and is proceeding in this case as a debtor-in-possession. Areya Holder Aurzada is the Subchapter V Trustee.

8. On November 1, 2021, Anson filed its Notice of Removal of the state court action between Frazier and the Debtor, under Adv. Proc. No. 21-04071.

### **Retention of Sullivan & Cook**

9. On February 9, 2022, Anson retained Sullivan & Cook as special counsel for the Debtor in connection with the prosecution of the Adv. Proc. No. 21-04071.

10. On March 4, 2022, the Court entered an Order (Docket No. 253) approving the employment application (Docket No. 238) (the “Employment Application”) and retention of Sullivan & Cook by Anson effective as of February 9, 2022.

### **Details of the fees and expenses**

11. During the Application Period, Sullivan & Cook expended a total of at least 49.60 hours, in the amount of approximately \$395.00 per hour for the professional working on this case.

12. The rates charged are the normal hourly billing rates of Sullivan & Cook in effect during the Application Period.

13. During the Application Period, Sullivan & Cook earned fees in the amount of \$19,592.00.

14. The following exhibits described the fees and expenses incurred by Sullivan & Cook during the Application Period.

<b>Exhibit No.</b>	<b>Description</b>
ANS175	Sullivan & Cook Fee Statements

15. The following professionals are included in the Fee Statements.

<b>Professional</b>	<b>Hourly rate</b>	<b>Experience</b>
Jason Ankele	\$395.00	Licensed since 1993, Primary practice area: Litigation

16. Sullivan & Cook maintained written records of the time expended by above attorney in the rendition of professional services to Anson. **Exhibit ANS175** contains the supporting detail of the hours, hourly rates, and fees attributable to the professional who performed services on behalf of Anson during the Application Period.

#### **RELIEF REQUESTED**

17. Sullivan & Cook seeks interim approval of its fees earned and expenses incurred for the Application Period, and, accordingly, the payment of such fees and expenses and authorization for the Debtor and/or the estate to make such payment upon entry of an Order approving this Application.

18. A proposed form of Order is submitted with this Application and is incorporated by reference herein.

#### **BASIS OF RELIEF**

19. During the time that Sullivan & Cook served as counsel to the Debtor, Sullivan & Cook performed the services essential to Anson's prosecution of Adv. Pro. No. 21-04071.

20. Sullivan & Cook represents that, to the best of its knowledge, it has complied with Code §§ 330 and/or 331, the Bankruptcy Rules, the Local Rules, and the Guidelines adopted by the Executive Office for the United States Trustee.

21. All legal services performed by Sullivan & Cook were performed for and on the behalf of Anson and not on behalf of any other individual or entity. These services were rendered in discharge of Sullivan & Cook's professional responsibilities as special counsel to Anson. Sullivan & Cook's services were reasonable and necessary in defending Anson in the Adv. Proc. No. 21-04071.

22. No payments have been made or promised to date except as set forth in this Application.

23. No compensation has been shared by Sullivan & Cook with any other entity.

24. No agreements to share compensation exist between Sullivan & Cook and any other person.

### **SUMMARY OF SERVICES PERFORMED**

25. Sullivan & Cook tracked the time billed in this case as set forth in **Exhibit ANS175**.

26. All services performed fall under the category B190, Litigation/Other Contested Matters, which includes work associated with addressing other litigation matters aside from the core proceedings occurring in the main case. For this case and this Debtor, this task category captured time relating to the adversary proceedings involving Frazier Asset Management, Inc. under Adv. Proc. No. 21-04071.

### **JUSTIFICATION FOR AWARD**

27. In an attempt to establish an objective basis for determining the amount of compensation that is reasonable for attorneys' services pursuant to Code § 330, the Fifth Circuit

has instructed the lower courts that they must explain the findings and reasons on which an award of professional fees is based.<sup>1</sup>

28. To aid the lower courts, the First Colonial court applied the factors originally set forth in *Johnson v. Georgia Highway Express, Inc.*, 488 F.2d 714 (5<sup>th</sup> Cir. 1974). The *Johnson* factors to be considered in determining the “reasonableness” of attorneys’ fees are delineated below, and Sullivan & Cook’s compliance therewith, if applicable, is described following each factor:

- a. Time and Labor Required. **Exhibit ANS175** delineates all the work performed by Sullivan & Cook for which compensation is requested during the Application Period. Sullivan & Cook submits that the information contained in the exhibit supports the fees requested and reflects the reasonableness of such fees.
- b. Novelty and/or Difficulty. The issues presented in Adv. Pro. No. 21-04071 are not novel or difficult per se, but they are complex; accordingly, the issues did require substantial attention and preparation for trial.
- c. Skill Requisite to Perform the Legal Service Properly. The attorney primarily working on this matter is primarily engaged in Texas state law litigation, of which Adv. Pro. No. 21-04071 is founded upon.
- d. Preclusion of Other Employment. The time demands of the general representation of Anson resulted in some disruption of other employment engagements undertaken by Sullivan & Cook during the Application Period.
- e. Customary Fee. The hourly rates charged for each professional performing services for Anson is summarized in the table above and appears in the Fee Statements, **Exhibit ANS175**. These rates are no greater, and in some instances, may be lower, than those being charged by professionals with similar qualifications and experience. The rates used in these cases are the same as those customarily charged by Sullivan & Cook for litigation clients. The hourly rates requested herein compare favorably with average costs for similar legal services being provided by statewide law firms that regularly appear in the Northern, Southern, Easter, and/or Western Districts of Texas, along with State District courts in Texas.

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<sup>1</sup> See *In re First Colonial Corp. of America*, 544 F.2d 1291 (5<sup>th</sup> Cir.), cert denied, 431 U.S. 904 (1977).

- f. Whether the Fee is Fixed or Contingent. Sullivan & Cook's fees are neither fixed nor contingent other than on the contingency of allowance by the Court and availability of assets for payment. Fees are based on the actual total number of hours worked.
- g. Time Limitations. This representation to date did represent somewhat unusual time limitations due to the quick trial docket setting and various trial preparation filings due.
- h. Amount Involved and Results Obtained. The fees incurred are very reasonable in relation to the issues arising and work performed to date. The work performed to date has helped to defend the Debtor's rights in connection with the prosecution of Adv. Proc. No. 21-04071. The results obtained during the Application Period include getting the Debtor ready for trial.
- i. Experience, Reputation, and Ability of the Attorneys. Sullivan & Cook's primary attorney assigned to this matter has appeared regularly in Texas state court litigation since 1993.
- j. Undesirability of Cases. Sullivan & Cook has not found these cases to be undesirable, but rather, considers the issues that have been raised in this case to be of the type that Sullivan & Cook is trained to adequately address.
- k. Nature and Length of Professional Relationship with Client. Sullivan & Cook has represented Anson in connection with the Frazier litigation since 2016.
- l. Awards in Similar Cases. Based on Sullivan & Cook's experience, the fees requested herein are commensurate with fees allowed in proceedings of similar scope for the services rendered.

#### **RESERVATION OF RIGHTS**

29. Sullivan & Cook reserves the right to amend, and/or supplement this Application.

#### **NOTICE**

30. Notice of this Application is served upon all parties which appear in the mailing matrix/creditors list available for this case and all registered ECF users who have appeared to date.

#### **CONCLUSION AND PRAYER**

WHEREFORE, Sullivan & Cook, LLC, respectfully requests interim approval and allowance of fees in the total amount of \$19,592.00 and authorization for the Debtor to make such

payment upon entry of an Order approving this Application. Sullivan & Cook respectfully requests such order and further relief to which Sullivan & Cook is entitled at law or in equity.

Dated: April 7, 2022

Respectfully submitted:

WEYKER, KAPLAN, PULASKI & ZUBER, P.C.

By: /s/ Jeff Carruth

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SPECIAL COUNSEL FOR ANSON FINANCIAL,  
INC.

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a true and correct copy of the foregoing was served on April 7, 2022 (1) by electronic notice to all ECF users who have appeared in this case to date, and/or as set forth below and (2) by regular mail to all parties appearing in the attached address list (i.e. mailing matrix) obtained from the Court's PACER facility. *A copy of the service lists was not served with the regular mail service set but is available by contacting the undersigned.*

**ANY PARTY REQUESTING A FULL SIZED COPY OF THIS PLEADING OR COPIES  
OF ANY EXHIBITS SHOULD CONTACT THE UNDERSIGNED.**

\_\_\_\_\_  
*/s/ Jeff Carruth*  
JEFF CARRUTH

**21-41517-elm11 Notice will be electronically mailed to:**

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**REGULAR MAIL LIST / MATRIX**

SERVICE LIST	Case No. 21-41517	In re: Anson Financial Inc.				
Creditor list download date:	Feb. 9, 2022					
Address1	Address2	Address3	Address4	Address5	Comment on matrix	Method of Service
Ghrist Law Firm PLLC	4016 Gateway Drive Suite 130	Colleyville, TX 76034-5958				NOA-ECF
JPMORGAN CHASE BANK, N.A.					undeliverable	none
JPMorgan Chase Bank, N.A. s/b/m/l Chase Bank	14841 Dallas Parkway, Suite 425	Dallas, TX 75254-8067				Regular mail
Leroy J. York Family Limited Partnership					undeliverable	none
Magan Law, PLLC					undeliverable	NOA-ECF
Wells Fargo Bank, National Association	c/o Larry Chek	Campbell Centre One	8350 N. Central Expressway, Suite 1111	Dallas, TX 75206-1625		none (claim withdrawn)
67th Judicial District Court of Tarrant Coun	100 N Calhoun Street 4th Floor	Fort Worth, Texas 76196-0207				Regular mail
Anson Financial, Inc.	62 Main Street, Suite 310	Colleyville, TX 76034-2931				Direct email
Arvela Godbey	568 Willowview Dr.	Saginaw, TX 76179-0965				Regular mail
B. Frazier Management, Inc.					undeliverable	none
B. Frazier Management, Inc.	CO Law Office of Caleb Moore	2205 Martin Dr., Ste 200	Bedford, TX 76021-6083			Regular mail
B. Frazier Management, Inc. and Brian Frazie	c/o Lyndel Anne Vargas	Cavazos Hendricks Poirot, PC	900 Jackson St., Suite 570	Dallas, TX 75202-2413		NOA-ECF
Beall Private Investments, LP - Affirm	5712 Colleyville Blvd., Suite 200	Colleyville, TX 76034-6068				Regular mail
Carol Godbey	P.O. Box 136273	Fort Worth, TX 76136-0273				Regular mail
City of Colleyville	% Perdue Brandon Fielder Et Al	500 E. Border Street	Suite 640	Arlington, TX 76010-7457		NOA-ECF
City of Colleyville	c/o Perdue Brandon Fielder et al	500 East Border Street, Suite 640	Arlington, TX 76010-7457			NOA-ECF
G. Parker Eldridge	9420 Capiland Rd.	Desert Hot Springs, CA 92240-1101				Regular mail
Ghrist Law Firm PLLC	CO Ian Ghrist	4016 Gateway Drive Suite 130	Colleyville, Texas 76034-5958			NOA-ECF
Grapevine-Colleyville ISD	c/o Perdue Brandon Fielder et al	500 E Border Street, Suite 640	Arlington, TX 76010-7457			NOA-ECF
Grapevine-Colleyville ISD	c/o Perdue Brandon Fielder et al	500 East Border Street, Suite 640	Arlington, TX 76010-7457			NOA-ECF
Heritage Credit, LLC	5712 Colleyville Blvd., Suite 200	Colleyville, TX 76034-6068				Regular mail
Internal Revenue Service	Centralized Insolvency Operation	PO Box 7346	Philadelphia, PA 19101-7346			Regular mail
JPMORGAN CHASE BANK N A	BANKRUPTCY MAIL INTAKE TEAM	700 KANSAS LANE FLOOR 01	MONROE LA 71203-4774		preferred	Regular mail
JPMorgan Chase Bank, N.A. s-b-m-l Chase Bank USA, N.A.	CO National Bankruptcy Services, LLC	P.O. Box 9013	Addison, Texas 75001-9013			Regular mail

SERVICE LIST	Case No. 21-41517	In re: Anson Financial Inc.				
Creditor list download date:	Feb. 9, 2022					
Address1	Address2	Address3	Address4	Address5	Comment on matrix	Method of Service
Jentex Financial, Inc.	c/o: Cashmire Financial Services	226 Bailey Ave, Ste 104	Fort Worth, TX 76107-1260			Regular mail
Jentex Financial, Inc.	226 Bailey Ave., Suite 101	Fort Worth, TX 76107-1260				Regular mail
Joseph Imad Yammine	PO Box 11781	Fort Worth, TX 76110-0781				NOA-ECF
Larry Starks	7045 Oakbluff Dr.	Dallas, TX 75254-2754				Regular mail
Leroy J. York Family Limited Partnership	508 N. Havenwood Lane	Fort Worth, TX 76112-1013				Regular mail
Leroy York	508 N. Havenwood	Fort Worth, TX 76112-1013				none (duplicate address)
Lorraine (Rainey) York Dukes	1100 Elizabeth Blvd.	Fort Worth, TX 76110-2619				Regular mail
Simone Barron	PO Box 11781	Fort Worth, TX 76110-0781				Regular mail
Small Business Administration	SBA Disaster Loan Service Center	1545 Hawkins Blvd., Ste 202	El Paso , TX 79925-2654			Regular mail
Tarrant County	Linebarger, Goggan, Blair & Sampson, LLP	c/o Laurie A. Spindler	2777 N. Stemmons Fwy Suite 1000	Dallas, TX 75207-2328		NOA-ECF
Tarrant County	Linebarger Goggan Blair & Sampson, LLP	c/o Laurie A. Spindler	2777 N. Stemmons Fwy. Ste. 1000	Dallas, TX 75207-2328		NOA-ECF
U.S. Small Business Administration	200 W. Santa Ana Blvd, Ste 740	Santa Ana, CA 92701-7534				Regular mail
United States Trustee	1100 Commerce Street	Room 976	Dallas, TX 75242-0996			NOA-ECF
Wells Fargo Bank, National Association	Attn: Dan Kline, V.P.	400 W. 15th Street, Suite 430	Austin, TX 78701-1654			none (claim withdraw)
York Family Partnership	508 N. Havenwood	Fort Worth, TX 76112-1013				none (duplicate address)
Areya Holder Aurzada (SBRA V)	Law Office of Areya Holder, P.C.	901 Main Street, Suite 5320	Dallas, TX 75202-3700			NOA-ECF
Brian Frazier	3345 Western Center Blvd., #160	Ft. Worth			undeliverable	none
Christopher Marvin Lee	Lee Law Firm, PLLC	8701 Bedford Euless Road	Suite 510	Hurst, TX 76053-3874		NOA-ECF
Jeffery D. Carruth	Weycer, Kaplan, Pulaski & Zuber, P.C.	3030 Matlock Rd., Suite 201	Arlington, TX 76015-2936			NOA-ECF
Joe Michael Ferguson					undeliverable	none
Joseph I Yammine					undeliverable	none
Kathryn Hernandez	Magan Law, PLLC	62 Main St.	Suite 310	Colleyville, TX 76034-2931		NOA-ECF
Simone Barron					undeliverable	none
Sterling Bates					undeliverable	NOA-ECF

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**UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF TEXAS  
FORT WORTH DIVISION**

**IN RE:**

**ANSON FINANCIAL, INC.,**  
**DEBTOR.**

§  
§  
§  
§

**CASE NO. 21-41517-elm-11**

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**ORDER GRANTING FIRST INTERIM FEE APPLICATION OF  
SULLIVAN & COOK, LLC AS SPECIAL COUNSEL TO DEBTOR (RE:  
DOCKET NO. 270)**

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On this day came on for consideration the *First Interim Fee Application of Sullivan & Cook, LLC as Special Counsel to the Debtor* (Docket No. 270) (the “Application”) filed herein on April 7, 2022 by Sullivan & Cook, LLC (“Sullivan & Cook”), attorneys for the Debtor. The Court finds and concludes that the Motion contains the appropriate notices under the Local Bankruptcy Rules, and no further notice is necessary, and that cause exists to grant the relief requested in the Sullivan & Cook Fee Application to the extent set forth below.

**IT IS THEREFORE ORDERED THAT:**

1. The Sullivan & Cook Fee Application is granted as set forth herein.

2. Sullivan & Cook is awarded on an interim basis fees in the total amount of \$19,592.00 for the representation of Anson by Sullivan & Cook during the Application Period, subject to later and final approval of the Court.

3. The Debtor is authorized and directed to pay Sullivan & Cook from funds of the estate for the fees awarded in this Order.

##### END OF ORDER #####

**Jeffrey E. Cook, Attorney at Law**

Board Certified, Civil Trial Law  
Texas Board of Legal Specialization

Office (214) 520-7494  
Cell (214) 478-2448  
Fax (214) 528-6925  
jcook@sullivancook.com

March 31, 2022

**EXHIBIT ANS175**

Mike Ferguson - via email  
mike@afimortgage.com

In Reference To: **CASE NO. 21-41517-ELM: In re Anson Financial, Inc., Debtor  
B. Frazier Management, Inc. and Brian H. Frazier v. Anson  
Financial, Inc.**

Invoice #52649

Professional Services

			Rate	Hours	Amount
2/9/2022	JA	Reviewed correspondence from M. Ferguson re: federal court trial; Telephone conference with M. Ferguson re: same; Conference re: representation of AFI in adversary proceeding; drafted agreement; reviewed and revised declaration re: representation of AFI; Telephone conference with M. Ferguson re: AFI trial; Telephone conference with K. Hernandez re: AFI representation.	395.00/hr	1.40	553.00
2/10/2022	JA	Reviewed scheduling order and scheduled all deadlines; reviewed motion to retain counsel.	395.00/hr	0.40	158.00
2/21/2022	JA	Exchanged correspondence re: hearing(s) on March 7.	395.00/hr	0.10	39.50
2/22/2022	JA	Reviewed correspondence re: whether limine hearing still necessary.	395.00/hr	0.10	39.50
2/24/2022	JA	Reviewed correspondence from Lyndel Vargas re: need for limine hearing on non-jury trial; reviewed Caleb Moore's response; Telephone conference with M. Ferguson re: status; Telephone conference with K. Hernandez re: status and strategy.	395.00/hr	1.20	474.00
2/25/2022	JA	Reviewed exchange of multiple correspondence re: limine and pretrial hearings.	395.00/hr	0.10	39.50
2/26/2022	JA	Began reviewing federal research forwarded by M. Ferguson.	395.00/hr	0.50	197.50
2/28/2022	JA	Reviewed additional federal research from M. Ferguson.	395.00/hr	0.20	79.00

Mike Ferguson - via email

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			Rate	Hours	Amount
3/1/2022	JA	Met with K. Hernandez and M. Ferguson re: strategy session and pretrial preparation plan; continued reviewing federal research forwarded by M. Ferguson and corresponded with him re: potential strategy.	395.00/hr	2.40	948.00
3/2/2022	JA	Reviewed multiple correspondences from K. Hernandez re: legal approach to trial; reviewed correspondence re: limine hearing; Conference re: jurisdiction; multiple telephone conferences with M Ferguson re: trial information and strategy.	395.00/hr	1.50	592.50
3/3/2022	JA	Reviewed correspondence from L. Vargas agreeing to remove limine hearing; Reviewed correspondence to court clerk removing liminie hearing; Worked on Joint Pretrial Order, including review of local rules and Telephone conference with K. Hernandez.	395.00/hr	1.00	395.00
3/4/2022	JA	Reviewed order granting employment in adversary proceeding; Telephone conference with M. Ferguson regarding status and strategy; Reviewed attorney's fees history bill for redaction.	395.00/hr	1.50	592.50
3/6/2022	JA	Cursory review of research and analysis forwarded by M. Ferguson.	395.00/hr	0.20	79.00
3/8/2022	JA	Reviewed exchange between counsel re: scope of hearing; worked on pretrial briefing, including Telephone conference with K. Hernandez.	395.00/hr	2.10	829.50
3/9/2022	JA	Completed review and revision of pretrial order and forwarded same to K. Hernandez; Conference with K. Hernandez regarding pretrial order and briefing.	395.00/hr	1.30	513.50
3/10/2022	JA	Reviewed revised pre-trial order and FAM's proposed stipulated facts; Telephone conference with K. Hernandez regarding same.	395.00/hr	0.50	197.50
3/11/2022	JA	Reviewed K. Hernandez's analysis of amendment of BOC; Telephone conference with K. Hernandez re: opposing counsel's resistance to logical pretrial order; reviewed correspondence from Lyndel Vargas re: Joint Pretrial Order.	395.00/hr	0.40	158.00
3/14/2022	JA	Reviewed multiple exchange of correspondence between L. Vargas and K. Hernandez; reviewed research from K. Hernandez re: standing; Telephone conference with K. Hernandez re: same and trial strategy.	395.00/hr	0.40	158.00
3/15/2022	JA	Reviewed research re: standing and capacity and extinguishment of claims; reviewed updated draft of joint pretrial order from L Vargas.	395.00/hr	1.10	434.50

Mike Ferguson - via email

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			Rate	Hours	Amount
3/16/2022	JA	Reviewed draft of Debtor's exhibit and witness list; client meeting re: preparation of exhibit list and witness list and general trial preparation.	395.00/hr	4.10	1,619.50
3/17/2022	JA	Conference re: attorneys' fees statement and redaction; Telephone conference with M. Ferguson re: pretrial filing and preparation; reviewed for redaction Sullivan & Cook history bill.	395.00/hr	1.10	434.50
3/18/2022	JA	Reviewed and revised draft joint pretrial order; Telephone conference with K. Hernandez re: same; reviewed correspondence from C Moore re: intended participation in trial; reviewed and redlined draft motion to disqualify Caleb Moore. as counsel	395.00/hr	2.40	948.00
3/21/2022	JA	Reviewed exhibit list and exhibits; began reviewing and conference re: plea to jurisdiction; multiple telephone conference with K. Hernandez re: pretrial matters; reviewed and redlined draft Motion to Disqualify Caleb Moore as counsel for FAM; reviewed correspondence from C Moore responding to potential disqualification.	395.00/hr	3.00	1,185.00
3/22/2022	JA	Reviewed additional exhibits from plaintiffs; Telephone conference with K. Hernandez re: DQ motion; drafted additional language for DQ motion based on prior witness designation of Ghrist; reviewed certain of plaintiff's exhibits re: Ghrist; Telephone conference with K. Hernandez re: same; reviewed exchange of correspondence between K. Hernandez and Caleb Moore re: conference on motion to DQ; Telephone conference with K. Hernandez re: motion to DQ; reviewed and redlined revised pretrial order; brief conference re: pretrial order.	395.00/hr	2.80	1,106.00
3/23/2022	JA	Reviewed and revised draft motion to DQ, including pulling docket sheet from 67th District court; Telephone conference with K. Hernandez re: same.	395.00/hr	1.30	513.50
3/24/2022	JA	Final review and redline of Motion to DQ and M. Ferguson declaration in support.	395.00/hr	0.70	276.50
3/25/2022	JA	Reviewed and revised plea to jurisdiction; reviewed and revised draft FOF and COL; multiple conferences re: pretrial filings; reviewed multiple correspondence re: amendments to draft pretrial order; cursory review of draft trial brief and conference re: same.	395.00/hr	4.40	1,738.00
3/26/2022	JA	Reviewed and revised Defendant's Trial Brief.	395.00/hr	2.00	790.00

Mike Ferguson - via email

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			Rate	Hours	Amount
3/27/2022	JA	Continued revisions to, and created redline of, Defendant's Trial Brief; Conference with K. Hernandez re: same.	395.00/hr	3.60	1,422.00
3/28/2022	JA	Reviewed and revised final draft of Defendant's FOF and COL; final review and revision of Defendants' Trial Brief; multiple conference re: same; reviewed and revised draft Plea to Jurisdiction.	395.00/hr	4.70	1,856.50
3/29/2022	JA	Telephone conference with K. Hernandez re: Plaintiff's pretrial filings and plea to jurisdiction strategy; reviewed and annotated Plaintiffs' Pretrial Brief; reviewed Plaintiffs' proposed FOF and COL; reviewed additional argument distinguishing single case on which Plaintiffs rely; final review of plea to jurisdiction and conference re: procedure and status; reviewed and worked on potential rebuttal exhibits; review additional research re: suing for breach of contract; Conference re: same.	395.00/hr	2.80	1,106.00
3/31/2022	JA	Reviewed enhanced briefing from K. Hernandez.	395.00/hr	0.30	118.50
For professional services rendered			49.60	\$19,592.00	
<b>Balance due</b>			<b>\$19,592.00</b>		

**PAYMENT OPTIONS:**

**WE ENCOURAGE YOU TO UTILIZE OUR SECURE ONLINE PAYMENT LINKS FOR PAYMENT BY CREDIT CARD OR ELECTRONIC CHECK \*please note that there is a \$10,000 transaction limit on electronic checks\*:**

**for payments of a statement balance due:**

<https://secure.lawpay.com/pages/jeffrey-e-cook-attorney-at-law/operating>

**for retainer replenishments:**

<https://secure.lawpay.com/pages/jeffrey-e-cook-attorney-at-law/trust>

**You may also call our office for credit card and electronic check processing.**

**If paying via paper check, please make it payable to:  
"JEFFREY E. COOK, ATTORNEY AT LAW"**

**TAX ID# 75-2354644**

Mike Ferguson - via email

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## Timekeeper Summary

Name	Hours	Rate	Amount
Jason Ankele	49.60	395.00	\$19,592.00